

# WORCESTER POLYTECHNIC INSTITUTE

## ACADEMIC AND CORPORATE ENGAGEMENT

Dear members of the Special Commission,

Worcester Polytechnic Institute respectfully submits this testimony in favor of Massachusetts becoming a member of the State Authorization Reciprocity Agreement.

### History of Online Education at WPI

WPI began its first distance-learning programs via mailed videotapes in 1993, even before online delivery was technically feasible. This began to transition to fully online delivery in 1999 and continued with steady growth since its inception.

Worcester Polytechnic Institute (WPI) first began following the topic of authorization reciprocity for online programs in 2012, an effort that evolved in response to proposed federal enforcement of state-to-state regulations. Since then, we have monitored the formation of the National Council for State Authorization Reciprocity Agreements (NC-SARA) as we have sought individual authorization from a number of states.

### Current State Authorization Statuses

WPI currently maintains the appropriate licenses, certifications, or other authorizations to deliver online education to students residing in the following states (with currently enrolled students shown for each state):

- Alaska (2)
- Georgia (4)
- Indiana (2)
- Maine\* (7)
- Maryland (8)
- Michigan (5)
- Minnesota (3)
- Montana (none currently)
- Nevada (2)
- Pennsylvania\* (14)
- South Dakota (none currently)
- Wyoming (none currently)

*Those states marked with a \* are not currently part of the NC-SARA agreement, but the other states would no longer require approval if WPI were a SARA member.*

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We are currently not authorized to accept students from the following states; all are SARA-member states:

- Alabama
- Arkansas
- Missouri
- Wisconsin

All other states, plus Puerto Rico and the District of Columbia, do not currently require any formal action on WPI's part to deliver online education to their residents. However, many of those remaining states have restrictions on our ability to advertise or recruit within the state, which SARA membership would alleviate.

### Future Considerations

In addition to the thousands of person-hours required to establish initial authorizations, WPI continues to expend considerable effort to maintain authorization in as many states as possible. In addition, the regulations are constantly and independently evolving in all 50 states, requiring a substantial effort to simply stay aware of the requirements. Application costs to date total approximately \$25,000, and legal fees paid to our attorneys, though not specifically logged for state authorizations, are in the tens of thousands of dollars.

WPI continues to turn away interested students from the four states listed above (AL, AR, MO, WI). While it is difficult to quantify the lost opportunity precisely, over the last year there have been over 80 inquiries from these states. In each case, we have responded that we aren't currently authorized to deliver online courses to those residents due to licensing restrictions.

In summary, we believe that being given the opportunity to join SARA will greatly reduce the cost, administrative burden, and compliance risks associated with maintaining independent authorizations in all relevant states. In addition, it will allow us to respond to the existing demand of interested students as noted above, as well as proactively attract students from all over the country. Finally, and perhaps most importantly, becoming a SARA-approved institution will put us on an even playing field with the many universities who are already SARA-approved as we compete freely for the best students from across the country.

Sincerely,



Brian Degon  
Director, Business Systems  
WPI Academic and Corporate Engagement